

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

JOEL VANGHELUWE, ET AL.,	§	
	§	2:18-cv-10542-LJM-EAS
Plaintiffs,	§	
v.	§	Hon. Laurie J. Michelson
	§	
GOTNEWS, LLC, ET AL.,	§	Mag. Elizabeth A. Stafford
	§	
Defendants.	§	
	§	

**STIPULATION OF DISMISSAL AS TO ALBERTO WAISMAN ONLY**

Plaintiffs and Alberto Waisman, Defendant, file this Stipulation of Dismissal under Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure.

1. Plaintiffs are Joel Vangheluwe and Jerome Vangheluwe. Defendants are GotNews L.L.C., Freedom Daily L.L.C., Charles C. Johnson, Alberto Waisman, Jeffrey Rainforth, Jim Hoft, David Petersen, Jonathan Spiel, Shirley Husar, Eduardo Doitteau, Lita Coulthart-Villanueva, Kenneth Strawn, Patrick Lehnhoff, Beth Eyestone, Lori Twohy, Raechel Hitchye, James Christopher Hastey, Christopher Jones, Connie Comeaux, Gavin McInnes, Richard Weikart and Paul Nehlen.
2. On February 14, 2018, Plaintiffs sued Defendants for defamation, defamation per se, intentional infliction of emotional distress, and invasion of privacy (false light).
3. Plaintiffs and Alberto Waisman have agreed to the dismissal of Alberto Waisman only as a defendant in this suit.
4. This case is not a class action under Fed. R. Civ. P. 23, a derivative action under Rule 23.1, an action related to an unincorporated association under Rule 23.2, or an action in which a receiver has been appointed under Rule 66.

5. This case is not governed by any federal statute that requires a court order for dismissal of this party.
6. Plaintiffs have not previously dismissed any federal or state court action based on or including the same claims as those presented in this case.
7. This dismissal of Alberto Waisman only is with prejudice.
8. Plaintiffs and Defendant Alberto Waisman agree that all costs and attorneys' fees are the responsibility of the party incurring same.

Respectfully submitted,

**Sommerman, McCaffity & Quesada  
L.L.P.**

/s/ Andrew B. Sommerman  
Andrew B. Sommerman  
State Bar No. 18842150  
3811 Turtle Creek Blvd., #1400  
Dallas, TX 75219  
P - (214) 720-0720  
F - (214) 720-0184  
E - andrew@texttrial.com

*Attorney for Plaintiffs*

**Dhillon Law Group, Inc.**

/s/ Harmeet K. Dhillon  
Harmeet K. Dhillon  
State Bar No. 207873  
177 Post St., Suite 700  
San Francisco, CA 94108  
P - (415) 433-1700  
F - (415) 520-6593  
E – harmeet@dhillonlaw.com

*Attorney for Defendant Alberto Waisman*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on August 2, 2018, the foregoing Stipulation of Dismissal was served via ECF on counsel of record who have appeared in the case.

Furthermore, on August 2, 2018, I affirm that I placed true and accurate copies of this document in First Class postage-prepaid, properly addressed, and sealed envelopes which were addressed to: Lita Coulthart-Villanueva, [REDACTED] Jeffries St., Anderson, CA [REDACTED]; Kenneth G. Strawn, [REDACTED] Cypress Lane, Mission Viejo, CA [REDACTED]; and Jeffrey Rainforth, [REDACTED] H. St., [REDACTED] Sacramento, CA [REDACTED].

/s/ Andrew B. Sommerman  
Andrew B. Sommerman